

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their  
official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;

Defendants.

Case No. 4:21-cv-03049

**DEFENDANTS’  
MOTION FOR LEAVE TO FILE  
RESTRICTED ACCESS DOCUMENTS**

Defendants Board of Regents of the University of Nebraska (“BRUN”); and Tamiko Strickman (“Ms. Strickman”), collectively (“Defendants”), pursuant to NECivR 5.3(C)(1), move the court for leave to file restricted access documents in support of their Motion for Summary Judgment and Motion to Exclude Plaintiff’s Experts and Strike (“Motions”). In support of this motion, Defendants state:

1. On February 7, 2022, the Court entered a Protective Order that provides: “Discovery Material designated as ‘CONFIDENTIAL’ shall be provisionally filed under restricted access with the filing party’s motion for leave to file restricted access documents.” [Filing No. 32, ¶ 11].

2. In support of Defendants’ Motions and Briefs, Defendants are filing exhibits, including discovery material marked confidential, or documents that reflect information from materials marked confidentially—specifically, Exhibits A – C, F – Q, S – V.

3. Such confidential discovery material is necessary evidence to support Defendants’ arguments in support of their Motions.

4. Because the documents themselves are protected as confidential or reflect confidential information, redaction would insufficiently protect the documents as required by the Court's Protective Order.

5. The confidential documents have been provisionally filed under restricted access.

WHEREFORE, Defendants respectfully request leave of the Court to file restricted access documents (Exhibits A – C, F – Q, S – V) in support of their Motions.

Dated this 15<sup>th</sup> day of September, 2023.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA and  
TAMIKO STRICKMAN, Defendants.

By: /s/ Lily Amare  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

/s/ Lily Amare

Lily Amare

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